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15 Attorneys for Plaintiffs Société du Figaro, SAS,  
16 L'Équipe 24/24 SAS, le GESTE, and the  
Proposed Classes

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 OAKLAND DIVISION

20 SOCIÉTÉ DU FIGARO, SAS, a French simplified  
21 joint-stock company; L'ÉQUIPE 24/24 SAS, a  
22 French simplified joint-stock company, on behalf of  
themselves and all others similarly situated; and LE  
23 GESTE, a French association, on behalf of itself, its  
members, and all others similarly situated,

24 Plaintiffs,

25 v.

26 APPLE INC., a California corporation,

27 Defendant.

28 No. 4:22-cv-04437 (YGR)

DECLARATION OF STEVE W. BERMAN  
IN SUPPORT OF STIPULATION AND  
[PROPOSED] ORDER REGARDING  
HEARING DATE FOR APPLE INC.'S  
MOTION TO DISMISS PLAINTIFFS'  
AMENDED COMPLAINT

Hon. Yvonne Gonzalez Rogers

1 I, Steve W. Berman, hereby declare as follows:

2 1. I am the managing partner of the law firm Hagens Berman Sobol Shapiro LLP and  
3 lead trial counsel for Plaintiffs herein. I am a member of the Washington Bar, and I have been  
4 admitted to this Court *pro hac vice* for purposes of this matter. I make this declaration based upon  
5 personal knowledge, and I am otherwise competent to testify.

6 2. On March 6, 2023, the Court continued the hearing on Defendant Apple Inc.'s motion  
7 to dismiss plaintiffs' amended complaint (Motion to Dismiss) from March 14, 2023, to June 23,  
8 2023. (ECF No. 70.) Unfortunately, I have a travel conflict with the newly scheduled date (as I did  
9 on March 6, 2023).

10 3. Due to my scheduling conflict, we consulted Apple counsel to determine if Apple  
11 would agree to reschedule the date, pending Court approval. The Parties have now agreed to  
12 continue the hearing on Apple's Motion to Dismiss to July 11, 2023, at 2:00 p.m., if the Court will  
13 permit this change.

14 4. Prior to the submission of this stipulation, the following time modifications occurred  
15 in this action:

16 a. On August 23, 2022, the Parties stipulated to an extension of time for Apple to  
17 respond to the complaint when this action was assigned to Judge Haywood S.  
18 Gilliam, Jr. (ECF No. 19);  
19 b. On September 9, 2022, after the action had been reassigned to Judge Gonzalez  
20 Rogers, the Parties refiled the stipulation for an extension of time for Apple to  
21 respond to the complaint (ECF No. 31); and  
22 c. On November 7, 2022, the Court approved the stipulation extending the time  
23 for Apple to respond to the complaint (ECF No. 44).

24 5. The Motion to Dismiss is briefed, and the requested continuance will not affect any

1 other current deadlines.

2 I declare under penalty of perjury under the laws of the United States that the foregoing is  
3 true and correct.

4 Executed this 3rd day of April, 2023, at Seattle, WA.

5  
6 /s/ Steve W. Berman  
7 STEVE W. BERMAN  
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